



United States Department of the Interior

OFFICE OF THE SECRETARY
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Memorandum

To: Solicitor
Inspector General
Assistant Secretaries
Heads of Bureaus and Offices

From: Marilia A. Matos *Marilia Matos*
Director, Office of Human Resources

Subject: Qualification Requirements for Firefighter Positions Covered by Secondary
(Administrative) Retirement Coverage

This memorandum is issued, to clearly define the wildland firefighting requirements for positions covered under secondary (administrative) firefighter retirement. As secondary (administrative) positions are covered under firefighter retirement, Office of Personnel Management (OPM) requires previous firefighting experience in order to qualify for firefighter retirement, and is considered a selective factor. A minimum of 90 days of wildland firefighting experience is required to meet qualifications for secondary (administrative) covered positions.

The Department of the Interior defines wildland firefighting experience as: on-the-line wildland firefighting experience gained through containment, control, suppression, or use of wildland fire. This experience can be met by serving in a temporary, seasonal, or equivalent private sector fire position for no less than 90 days. Periods of wildland firefighting experience, gained through militia and rural fire departments, can also be credited, as long as the total amount of this experience equates to at least 90 days.

Wildland fire is defined as any non-structure fire that occurs in the wildland. Three distinct types of wildland fire have been defined and include wildfire, wildland fire use, and prescribed fire:

Wildfire. An unplanned, unwanted wildland fire, including unauthorized human-caused fires, escaped wildland fire use events, escaped prescribed fire projects, and all other wildland fires where the objective of the firefighter is to put the fire out.

Wildland Fire Use. The application of the appropriate management response to naturally ignited wildland fires to accomplish specific resource management objectives in predefined designated areas outlined in Fire Management Plans.

Prescribed Fire. Any fire ignited by management actions to meet specific objectives. A written, approved prescribed fire plan must exist, and the National Environmental Protection Act (NEPA) requirements (where applicable) must be met, prior to ignition. This description includes only fireline experience on a Prescribed Fire; it does not include experience in the planning stages. Prescribed fire experience must be supplemented by fire suppression experience in order to be creditable as previous wildland firefighting experience.

The above definitions for wildland firefighting experience are to be used when qualifying applicants for secondary (administrative) covered positions and are to be considered a selective factor. Please include these definitions in all vacancy announcements when advertising covered positions. Wildland firefighting experience is required in position descriptions covered as secondary (administrative).

The requirement of wildland firefighting experience should not be confused with an employee's firefighter coverage. An employee may go into a secondary (administrative) position and not be covered for firefighter retirement; however, they cannot go into the position without meeting the 90-day requirement. The wildland firefighting experience can be gained at any grade level and series. The wildland firefighting experience does not substitute for the 1 year of specialized experience at the next lower grade level for individuals applying for promotion opportunities.

The OPM Operating Manual for Qualification Standards for General Schedule Positions provides authority to waive a requirement, on a case-by-case basis for specific reasons, e.g., administrative error on the part of the agency. It is important to recognize that on rare occasions there may be applicants who may not meet the 90-day requirement, but who, in fact, may be demonstrably well qualified to perform the work because of exceptional experience in that field. In such instances, a more comprehensive evaluation must be made of the applicant's work history.

To be considered qualified the applicant's work experience must reflect significant full performance-level accomplishment directly applicable to the position to be filled; and be verified by a panel of at least two subject-matter-experts who have standing in the field. Such verification is necessary to insure that the applicant's background is compared to the appropriate duties and responsibilities required at the full performance level of the position. Therefore, current employees who meet this situation should thoroughly document the professional experience when applying to future secondary (administrative) covered positions and formally request a waiver of the 90-days of wildland firefighting experience.

If you have any questions, please contact Michael Ballew on (202) 513-0755, or via e-mail at Michael_Ballew@ios.doi.gov.

cc:

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